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*Attorneys for Plaintiffs,*  
CANTERS DELI LAS VEGAS, LLC and  
CANTERS DELI TIVOLI VILLAGE LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CANTERS DELI LAS VEGAS LLC, a citizen  
of the state of California; and CANTERS  
DELI TIVOLI VILLAGE LLC, a citizen of the  
State of California,

*Plaintiffs,*

v.

BANC OF AMERICA MERCHANT  
SERVICES, LLC, a citizen of the States of  
Delaware and Georgia; BANK OF AMERICA,  
N.A., a citizen of the State of North Carolina;  
FREEDOMPAY, INC., a citizen of the States  
of Delaware and Pennsylvania; and DOES 1  
through 10,

*Defendants.*

CASE NO.: 2:18-cv-01908-KJD-NJK

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND RESPONSE AND  
REPLY DEADLINES IN  
CONNECTION WITH DEFENDANT  
FREEDOMPAY, INC.'S MOTION TO  
DISMISS OR, IN THE ALTERNATIVE,  
TO TRANSFER VENUE TO THE  
EASTERN DISTRICT OF  
PENNSYLVANIA**

**[SECOND REQUEST]**

Plaintiffs CANTERS DELI LAS VEGAS LLC and CANTERS DELI TIVOLI VILLAGE  
LLC (together, "Canter"), and Defendant FREEDOMPAY, INC. ("FreedomPay"), by and  
through their undersigned counsel of record, hereby stipulate and agree to extend the reply  
deadline in connection with Defendant FreedomPay, Inc.'s Motion To Dismiss or, in the  
Alternative, to Transfer Venue to the Eastern District of Pennsylvania filed on November 8, 2018  
("Motion to Dismiss"), as follows:

WHEREAS, the parties previously agreed to extend the response and reply deadlines  
associated with the Motion to Dismiss (*see* ECF No. 17);

WHEREAS, due to a clerical error, the stipulation submitted to the Court erroneously

identified the reply response as December 10, 2018, instead of December 17, 2018, as the parties agreed. The Court then granted the stipulation, such that the current deadline is currently set for December 10, 2018 (*see* ECF No. 18); and

WHEREAS, the parties therefore seek the Court's approval to extend the deadline for FreedomPay to file its reply in support of its Motion to Dismiss, and this is their second request.

THEREFORE, in consideration of the foregoing, the parties request that the Court modify the briefing schedule, as follows:

2. That the deadline for FreedomPay to file a reply in support of FreedomPay's Motion to Dismiss is extended up to and including **December 17, 2018**.

DATED this 4<sup>th</sup> day of December, 2018

BROWNSTEIN HYATT FARBER  
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By: /s/ Adam K. Bult

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CANTERS DELI LAS VEGAS, LLC and  
CANTERS DELI TIVOLI VILLAGE LLC*

DATED this 4<sup>th</sup> day of December, 2018

GORDON REES SCULLY MANSUKHANI,  
LLP

By: /s/ Craig J. Mariam

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*Attorney for Defendant  
FREEDOMPAY, INC.*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

Dated: December 12, 2018